

RALPH A. FERRO, JR., ESQ.

Caption in compliance with D.N.J. LBR 9004-1

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Proposed Counsel for

TMMM MECH, LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

TMMM MECH, LLC

Debtor.

Case No. 21-13622

Chapter 11

Hon. Stacey L. Meisel

Hearing Date and Time:

**NOTICE OF MOTION FOR INTERIM ORDER: (I) AUTHORIZING USE OF CASH
COLLATERAL; (II) PROVIDING ADEQUATE PROTECTION FOR THE USE OF
CASH COLLATERAL; (III) SCHEDULING A FINAL HEARING; AND (IV)
GRANTING RELATED RELIEF**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that TMMM MECH, LLC, the within debtor-in-possession (the “Debtor”) will move at a time and date as provided for in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters before the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, for entry of an Interim Order: (I) Authorizing Use of Cash Collateral; (II) Granting the Prepetition Lender Adequate Protection; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (the “Motion”); and for such other and further relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the Certification of Simone Timothy, and the accompanying legal memorandum, which collectively sets forth the relevant factual and legal bases upon which the relief requested

should be granted. A proposed order granting the relief requested is also being submitted simultaneously with the Motion.

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the Debtor's motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, 07102 and served simultaneously upon, Ralph A. Ferro, Jr., Esq, as counsel for the Debtor, at 66 East Main Street, 3rd Floor, Little Falls, New Jersey 07424; and

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the Motion is contested or so directed by the Court.

RALPH A. FERRO, JR., Esq.
Counsel to the Debtor

Dated: May 1, 2021

By: /s/ Ralph A. Ferro, Jr.
Ralph A. Ferro, Jr.